

# **THE MIDDLEBURGH TELEPHONE COMPANY STATEMENT OF COMPANY POLICY**

***When referred to in the guidelines set forth below, "Company," "we," or "us" refers to and includes all employees, associates, and agents of The Middleburgh Telephone Company***

The Middleburgh Telephone Company (the "Company") has a duty to protect the confidential, Customer Proprietary Network Information ("CPNI") of our customers, other telecommunications carriers, and equipment manufacturers. Therefore, the following guidelines shall be followed by all employees and agents of the Company:

CPNI is any information that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship. CPNI also includes information contained in the bills pertaining to the telephone exchange service or telephone toll service received by a customer of a carrier.

- ! Proprietary information of our customers, other telecommunications carriers, and equipment manufacturers is protected by Federal law.
- ! CPNI which the Company obtains from another carrier for the purpose of providing a particular telecommunications service may be used only for the provision of that service, and may not be used for any otherwise unrelated marketing efforts.
- ! Individually identifiable CPNI that we obtain by providing a telecommunications service may be used, disclosed, or released ***only*** in the circumstances as set forth in the Company's CPNI Operating Guidelines.

**The release of any CPNI by sales personnel must be authorized by a supervisor.**

**The Company takes seriously the protection of our customers' CPNI, and in accordance with 47 C.F.R. § 64.2009 will be subject to disciplinary review for violation of the policies set forth above. Please contact your supervisor if you have any questions or require additional information.**